

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re **Tatyna Petrosov**

Debtor

Case  
No. **19-16061/amc**  
Chapter **13**

**RESPONSE TO MOTION FOR RELIEF OF  
NEWREZ, LLC D/B/A SHELLPOINT MORTGAGE SERVICING, ET AL**

Debtor, Tatyna Petrosov by her counsel,, Bradly E. Allen files this Response and avers the following:

1. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
2. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
3. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
4. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
5. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
6. Admitted.
7. Admitted.
8. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
9. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
10. Admitted.
11. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.
12. Admitted in part, denied in part. It is admitted that debtor did not make all of her post-petition mortgage payments, but it is denied that she owes \$7,140.65 total for post-petition mortgage payments.

13. Denied. The averments in this paragraph are legal conclusions to which no response is required and is therefore deemed denied.

WHEREFORE, Debtor request this Honorable Court to deny the Motion for Relief of Newrez, LLC, d/b/a Shellpoint Mortgage Servicing, et. al.

Respectfully submitted,

/s/Bradly E. Allen, Esquire  
Attorney for Debtor, Tatyna Petrosov

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**ORDER**

AND NOW, this                      day of                      , 2022 upon Motion of Newrez, LLC d/b/a Shellpoint Mortgage Servicing, et al Motion for Relief from the Automatic Stay and Debtor's Response it is hereby:

ORDERED that the Motion for Relief of Newrez, LLC d/b/a Shellpoint Mortgage Servicing, et al is denied.

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HONORABLE ASHELY M. CHAN  
U.S. BANKRUPTCY JUDGE